

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

SureFunding, LLC,

Debtor.

Chapter 11

Case No. 20-10953 (LSS)

**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON OCTOBER 17, 2022 AT 11:00 A.M. (ET)**<sup>1</sup>

**MATTERS GOING FORWARD:**

1. Debtor's Application for Entry of an Order Authorizing the Debtor to Employ and Retain Gavin/Solmonese LLC to Provide a Chief Restructuring Officer and Related Services Pursuant to 11 U.S.C. §§ 363 and 105 Effective as of the Petition Date [Filed April 20, 2020; [Docket No. 24](#)].

Objection Deadline: May 5, 2020 at 4:00 p.m.

Responses/Objections Received

- A. [Redacted] Noteholders' Omnibus Objection to Debtors' Motions [Filed May 4, 2020; [Docket No. 56](#)].
- B. Noteholders' Supplemental Objection to Debtor's Application for Entry of an Order Authorizing and Approving Retention of Gavin/Solmonese LLC [Filed October 13, 2022; [Docket No. 167](#)].

Related Documents:

- A. Supplemental Declaration of Edward T. Gavin, CTP, NCPM in Support of the Debtor's Application for Entry of an Order Authorizing the Debtor to Employ and Retain Gavin/Solmonese LLC to Provide a Chief Restructuring Officer and Related Services Pursuant to 11 U.S.C. §§ 363 and 105 Effective as of the Petition Date [Filed September 30, 2022; [Docket No. 156](#)].
- B. Notice of Hearing on Debtor's Application for Entry of an Order Authorizing the Debtor to Employ and Retain Gavin/Solmonese LLC to Provide a Chief

---

<sup>1</sup> The hearing will be held before The Honorable Chief Judge Laurie Selber Silverstein at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom 2, Wilmington, Delaware 19801. Any attorney or party can listen only via zoom by registering with the Zoom link <https://debuscourts.zoomgov.com/meeting/register/vJltcumprzwqGC2P10B8mJnt7u-UZbWHF9c> no later than October 17, 2022 at 8:00 a.m. After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing. Any exceptions must be approved by chambers.

Restructuring Officer and Related Services Pursuant to 11 U.S.C. §§ 363 and 105 Effective as of the Petition Date [Filed October 7, 2022; [Docket No. 164](#)].

Status: This matter is going forward.

2. Application for Entry of an Order Authorizing and Approving the Employment of Morris James LLP as Replacement Counsel to the Debtor *Nunc Pro Tunc* to July 6, 2022 [Filed August 5, 2022; [Docket No. 128](#)].

Objection Deadline: August 19, 2022 at 4:00 p.m.

Responses/Objections Received:

- A. Noteholders' Objection to Debtor's Application for Entry of an Order Authorizing and Approving the Employment of Morris James LLP as Replacement Counsel to the Debtor *Nunc Pro Tunc* to July 6, 2022 [Filed August 18, 2022; [Docket No. 129](#)].

Related Documents:

- A. Notice of Hearing on Application for Entry of an Order Authorizing and Approving the Employment of Morris James LLP as Replacement Counsel to the Debtor *Nunc Pro Tunc* to July 6, 2022 [Filed September 27, 2022; [Docket No. 145](#)].

Status: This matter is going forward.

3. United States Trustee's Supplemental Motion for an Order Converting this Case to a Chapter 7 Or Directing the Appointment of a Trustee [Filed September 27, 2022; [Docket No. 147](#)].

Objection Deadline: October 11, 2022 at 4:00 p.m.; extended for the Debtor to October 12, 2022.

Responses/Objections Received:

- A. Debtor's Omnibus Opposition to United States Trustee's Motion for an Order Converting this Case to Chapter 7 or Appointing a Trustee [D.I. 147] and Noteholders' Motion for an Order Converting this Case to Chapter 7 [D.I. 150] [Filed October 12, 2022; [Docket No. 165](#)].

Related Documents:

- A. United States Trustee's Motion for an Order Dismissing or Converting this Case to Chapter 7 or Directing the Appointment of a Trustee [Filed April 24, 2020; [Docket No. 34](#)].

- B. Motion to Shorten Time on the United States Trustee's Supplemental Motion for Entry of an Order Converting Case to Chapter 7 or Directing the Appointment of a Trustee [Filed September 27, 2022; [Docket No. 148](#)].
- C. Debtor's Opposition to United States Trustee's and Certain Noteholders' Motions to Shorten [Filed September 30, 2022; [Docket No. 155](#)].
- D. Order Pursuant To Local Rule 9006-1(e) Granting United States Trustees Motion To Shorten Time For A Hearing On The United States Trustees Supplemental Motion For Entry Of An Converting This Case To Chapter 7 Or Directing The Appointment Of A Trustee [Filed October 3, 2022; [Docket No. 158](#)].
- E. Notice of United States Trustee's Supplemental Motion for an Order Converting this Case to a Chapter 7 Or Directing the Appointment of a Trustee [Filed October 4, 2022; [Docket No. 160](#)].

Status: This matter is going forward.

- 4. Noteholders' Motion for an Order Converting this Case to Chapter 7 [Filed September 27, 2022; [Docket No. 150](#)].

Objection Deadline: At the hearing.

Responses/Objections Received:

- A. Debtor's Omnibus Opposition to United States Trustee's Motion for an Order Converting this Case to Chapter 7 or Appointing a Trustee [D.I. 147] and Noteholders' Motion for an Order Converting this Case to Chapter 7 [D.I. 150] [Filed October 12, 2022; [Docket No. 165](#)].
- B. Noteholders' Reply in Support of their Motion for an Order Converting this Case to Chapter 7 [Filed October 13, 2022; [Docket No. 166](#)].

Related Documents:

- A. Motion to Shorten Notice Period with Respect to Noteholders' Motion for an Order Converting this Case to Chapter 7 [Filed September 27, 2022; [Docket No. 151](#)].
- B. Debtor's Opposition to United States Trustee's and Certain Noteholders' Motions to Shorten [Filed September 30, 2022; [Docket No. 155](#)].

C. Order Granting Motion To Shorten Notice Period With Respect To Noteholders Motion For An Order Converting This Case To Chapter 7 [Filed October 3, 2022; [Docket No. 159](#)].

D. Amended Notice of Hearing Regarding Noteholders' Motion for an Order Converting this Case to Chapter 7 [Filed October 4, 2022; [Docket No. 161](#)].

Status: This matter is going forward.

Dated: October 13, 2022

MORRIS JAMES LLP

/s/ Carl N. Kunz, III

Carl N. Kunz, III (DE Bar No. 3201)

Jeffrey R. Waxman (DE Bar No. 4159)

500 Delaware Avenue, Suite 1500

Wilmington, DE 19801

Telephone: (302) 888-6800

Facsimile: (302) 571-1750

E-mail: ckunz@morrisjames.com

E-mail: jwaxman@morrisjames.com

*Proposed Counsel to the Debtor*